

Hardesty, Doug

From: Hardesty, Doug
Sent: Thursday, March 27, 2014 2:31 PM
To: Baumgartner, James R (DEC)
Subject: RE: AQ0268TVP02 EPA 45-Day Review for BPXA's Flow Station #2

Thanks

Doug Hardesty
208.378.5759
Air Permits and Diesel Unit
Office of Air, Waste and Toxics
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From: Baumgartner, James R (DEC) [<mailto:jim.baumgartner@alaska.gov>]
Sent: Thursday, March 27, 2014 2:08 PM
To: Hardesty, Doug
Cc: Plosay, James R (DEC); Baumgartner, James R (DEC)
Subject: RE: AQ0268TVP02 EPA 45-Day Review for BPXA's Flow Station #2

Doug,

Thanks for asking. Attached are two earlier e-mails from you & also attached is Pat Nair's recommendation from last fall. After we received Pat's recommendation, the clients elevated the decision and we retained footnotes stating that the federal BACT emission limits apply at full load, but the permittee is required to use good operational practices with pipeline quality natural gas at all loads. There are 1997 NSR interpretations that Bonnie Thie sent to ARCO and BP regarding these sources.

The objection consideration would be whether EPA objects to our inclusion of the "full load" BACT footnotes.

Regards,

Jim Baumgartner

From: Hardesty, Doug [<mailto:Hardesty.Doug@epa.gov>]
Sent: Thursday, March 27, 2014 10:42 AM
To: Plosay, James R (DEC)
Cc: Baumgartner, James R (DEC)
Subject: RE: AQ0268TVP02 EPA 45-Day Review for BPXA's Flow Station #2

This is a little odd. We don't comment on proposed permits. Our legal options are to object or do nothing. If you want an opinion on something, including it in a proposed permit is not the way to get it.

Have you been working with someone on this?

I will run it by my supervisor next week to decide whether it is something we will review.

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From: Plosay, James R (DEC) [<mailto:jim.plosay@alaska.gov>]
Sent: Thursday, March 27, 2014 12:31 PM
To: Hardesty, Doug
Cc: Baumgartner, James R (DEC)
Subject: FW: AQ0268TVP02 EPA 45-Day Review for BPXA's Flow Station #2

Doug – This EPA 45-Day Package submittal was originally sent to Laurie Kral on 03/04. It has a specific request for EPA to review the BACT incorporation issues.

Jim Plosay
Compliance Section Juneau, Office Supervisor

From: Ollila, Tera L (DEC)
Sent: Tuesday, March 04, 2014 15:26
To: 'kral.laurie@epa.gov'; Blackmore, Michelle L (DEC); Hoffard, Renee (DEC); Copeland, Brandon H (DEC); Suarez, Nino R (DEC); Ausel, Joey K (DEC); Ollila, Tera L (DEC)
Cc: Baumgartner, James R (DEC); Coss, Pablo M (DEC); Plosay, James R (DEC); Ptak, Jeremy M (DEC); Dunn, Patrick E (DEC); Siddeek, Fathima Z (DEC); 'bruce.price@bp.com'; 'gregory.arthur@bp.com'; Atley, Linda E (DEC)
Subject: AQ0268TVP02 EPA 45-Day Review for BPXA's Flow Station #2

All recipients:

Please review or copy as required.

Thank you.

Tera L. Ollila
Secretary

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